

Keith Altman (SBN 257309)  
THE LAW OFFICE OF KEITH ALTMAN  
33228 West 12 Mile Road, Suite 375  
Farmington Hills, Michigan 48334  
Telephone: (516) 456-5885  
kaltman@lawampmmt.com  
*Attorneys For Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

AMBASSADOR MARC GINSBERG and  
COALITION FOR A SAFER WEB,

Plaintiffs,

v.

GOOGLE LLC.,

Defendant.

CASE NO.: 5:21-cv-00570-BLF

**PLAINTIFFS' STATUS REPORT**

Judge Beth Labson Freeman

Plaintiffs Ambassador Marc Ginsberg and Coalition for a Safer Web, pursuant to the August 26, 2021, Order of this Honorable Court (*See* Dkt. 27), by and through their counsel Keith Altman, submit to this Status Report and state as follows:

1. The undersigned attorney continues to suffer from serious health problems that substantially impact his vision and ability to comply with litigation deadlines in the present case.
2. As a result of these serious health problems, the undersigned attorney has been unable to make significant progress towards Plaintiffs' litigation goals.

3. There are currently three pending cases on the Court of Appeals of the Ninth Circuit docket that have the potential to affect the substantive law involved in this case. These cases are *Taamneh v. Twitter, et al.*, No. 18-17192, *Gonzalez v. Twitter, et al.*, No. 18-16700, and *Clayborn v. Twitter, et al.*, No. 19-15043 (all appellate cases).
4. These Appellate cases are likely to require the Court of Appeals of the Ninth Circuit to interpret 47 U.S.C. § 230 in a manner that will bear on the substantive legal issues in this case.
5. Allowing this case to proceed before the Appellate cases are decided might cause the parties in this case to be subjected to contradictory and inconsistent judgements.
6. WHEREFORE, for the reasons stated above, Plaintiffs respectfully request this Court to grant a continuance to the current postponement of all conferences, hearings, and trial dates, as well as extend deadlines for discovery and all other pre-trial deadlines until after *Taamneh v. Twitter, et al.*, No. 18-17192, *Gonzalez v. Twitter, et al.*, No. 18-16700, and *Clayborn v. Twitter, et al.*, No. 19-15043 have been decided.

Dated: September 9, 2021

Respectfully submitted,

/s/ Keith Altman

Keith Altman (SBN 257309)  
 THE LAW OFFICE OF KEITH ALTMAN  
 33228 West 12 Mile Road, Suite 375  
 Farmington Hills, Michigan 48334  
 Telephone: (516) 456-5885  
 kaltman@lawampmmt.com  
 Attorney For Plaintiffs

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on September 9, 2021, I served the foregoing document on all Defendants of record via electronic filing:

By: /s/ Keith Altman  
Keith Altman